

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**UNITED STATES**

**V.**

**DZHOKHAR A. TSARNAEV**  
**a/k/a “Jahar Tsarni”,**  
**Defendant.**

**Crim. No. 13-10200-GAO**

**GOVERNMENT’S ASSENTED-TO**  
**MOTION FOR A PROTECTIVE ORDER**

The United States, by and through Carmen M. Ortiz, United States Attorney, and Aloke Chakravarty, Nadine Pellegrini and William Weinreb, Assistant U.S. Attorneys for the District of Massachusetts, respectfully submits this Motion For A Protective Order, and states as follows:

The United States has provided and is in the process of providing discovery. Discovery materials in this matter include victim and witness information, personal identifying information, law enforcement sensitive information, and other information that must be restricted from widespread disclosure to safeguard the privacy of individuals and the integrity of ongoing investigations. Accordingly, the parties have agreed to the entry of a protective order (attached hereto) to ensure that discovery information is not unnecessarily disseminated, that sensitive information is filed under seal, and that access controls are in place. The parties agree that the attached order is in the interests of justice.

Wherefore, the government respectfully requests that the Court grant this motion and enter the attached protective order.

Respectfully submitted,

CARMEN M. ORTIZ  
United States Attorney

By: /s/ Alope Chakravarty  
ALOE CHAKRAVARTY  
NADINE PELLEGRINI  
WILLIAM WEINREB  
Assistant United States Attorneys

Dated: August 16, 2013